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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

29
30 Jessica Kahraman, *et al.*,
31 Plaintiffs,
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33 v.
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35 State of Arizona, *et al.*,
36 Defendants.

37 Case No.: 2:22-cv-00375-PHX-SRB

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1 on September 15, 2023, and which Defendant Kaplan-Siekman has joined (Doc.
 2 155), and then beginning the process of finalizing Plaintiffs' response to Defendant
 3 Kaplan-Siekman's separate motion for judgment on the pleadings (Doc. 154),
 4 which is currently due on September 18, 2023, it became clear there is substantial
 5 overlap between the two motions and responses. Consequently, Plaintiffs believe
 6 it makes sense logically and as a means of conserving judicial resources to
 7 combine the two responses into one filing. Accordingly, Plaintiffs need a few more
 8 days to combine the two separate responses into one filing and finalize that
 9 combined filing. There is no prejudice to Defendant Kelly by the short extension.
 10 Plaintiffs and Defendant Kelly have conferred by email and agree that good cause
 11 exists to extend the time for Plaintiffs to respond to Defendant Kelly's motion up
 12 to and including 18 September 2023, thus making this a consent motion.

13 Finally, due of the number of arguments asserted by Defendants and
 14 because it will be a combined response, Plaintiffs anticipate the response will be a
 15 few pages over the presumptive 17-page limit but not more than 25 pages.
 16 Plaintiffs have notified Defendant Kelly of this issue in a subsequent email but
 17 have not received a response from Kelly's counsel because of the lateness of the
 18 hour of that subsequent email. Plaintiffs reasonably anticipate that Defendants
 19 will not object to the extra pages.

20 A proposed Order is also submitted for the Court's consideration.

21 **RESPECTFULLY SUBMITTED** this 15th day of September 2023.

23 **MILLS + WOODS LAW PLLC**

24 By /s/ Thomas A. Connelly
 25 Thomas A. Connelly
 26 Robert T. Mills
 27 Sean A. Woods
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10 *Attorneys for Plaintiffs*

11 **CERTIFICATE OF SERVICE**

12 I hereby certify that on September 15, 2023, I electronically transmitted the
13 foregoing document to be filed electronically with the Clerk's Office through the
14 CM/ECF System for filing and transmittal of a Notice of Electronic Filing to be
15 served on all counsel of record via the Court's CM/ECF system.

16 _____
17 /s/ *Thomas A. Connely*
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